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18 Attorneys for Plaintiff
19 Johnny Doe, a minor and through his Guardian, Jane Doe, on
20 behalf of himself and all others similarly situated

21 **UNITED STATES DISTRICT COURT**
22
NORTHERN DISTRICT OF CALIFORNIA

23 JOHNNY DOE, a minor, by and through his
24 Guardian, JANE DOE, on behalf of himself and all
25 others similarly situated,

26 Case No. 4:19cv3629

27 **DECLARATION OF DEEPALI
28 BRAHMBHATT IN SUPPORT OF
PLAINTIFF'S MOTION FOR LEAVE TO
PROCEED UNDER PSEUDONYMS**

EPIC GAMES, INC., a North Carolina
corporation,

Defendant.

CLASS ACTION

29

I, Deepali Brahmbhatt, hereby declare as follows

2 1. I am an attorney at the law firm of One LLP, counsel of record in the above-referenced
3 action for Plaintiff. I make this Declaration upon personal knowledge and in support of Plaintiff's Motion
4 to Proceed under Pseudonyms ("Motion"). I am over twenty-one years of age and not under any legal
5 disability. If called and sworn as a witness, I would testify competently and truthfully as to the facts in this
6 Declaration.

7 2. I know the identity of Plaintiff Johnny Doe and his guardian Jane Doe. Plaintiff is prepared
8 to provide a statement of his true identity and his guardian's identity for the Court's in camera review,
9 upon the Court's request.

10 3. Disclosing Plaintiff and his guardian's identities will lead to psychological distress and
11 physical symptoms thereof, as well as have a negative impact in their personal and social lives. Plaintiff
12 and his guardian's fear of discrimination and retaliation that may interfere with his life at school,
13 neighborhood and community and ruin his ability to progress in his career and personal life, obtain future
14 employment, and provide for his family are reasonable.

15 4. We respectfully request that this Court permit Plaintiff and his guardian to pursue his
16 claims under pseudonyms to protect his privacy in this litigation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

19 || Executed this 21th day of June 2019 in California.

/s/ Deepali A. Brahmbhatt